

1 Jennifer McKee  
2 Nevada State Bar No. 9624  
3 CLYDE & CO US LLP  
3960 Howard Hughes Parkway, Suite 500  
4 Las Vegas, Nevada 89169  
Telephone: (702) 633-5703  
5 Facsimile: (702) 990-3501  
Email: jennifer.mckee@clydeco.us

6 Attorneys for Defendants  
7 Certain Underwriters at Lloyd's, London  
8 Subscribing to Policy No. B0595XN5229017  
9 (erroneously sued as Certain Underwriters at  
10 Lloyd's London subscribing to Besso policy  
11 number B0595XN5229017, Apollo Liability  
12 Consortium Number 9984, including Apollo  
13 Syndicate Management Limited)

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 FREYSSINET, INC., a Virginia corporation,

17 Plaintiff,

18 v.

19 BESSO INSURANCE GROUP LTD., a  
20 United Kingdom company, and CERTAIN  
21 UNDERWRITERS AT LLOYD'S, LONDON  
22 SUBSCRIBING TO BESSO POLICY  
23 NUMBER B0595XN5229017, APOLLO  
LIABILITY CONSORTIUM NUMBER 9984,  
including APOLLO SYNDICATE  
MANAGEMENT LIMITED, a United  
Kingdom company,

Defendants.

Case No. 2:21-CV-00418-RFB

STIPULATION AND ORDER TO EXTEND  
TIME TO RESPOND TO COMPLAINT FOR  
CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON SUBSCRIBING TO POLICY NO.  
B0595XN5229017 (ERRONEOUSLY SUED  
AS CERTAIN UNDERWRITERS AT  
LLOYD'S LONDON SUBSCRIBING TO  
BESSO POLICY NUMBER  
B0595XN5229017, APOLLO LIABILITY  
CONSORTIUM NUMBER 9984,  
INCLUDING APOLLO SYNDICATE  
MANAGEMENT LIMITED)

(FIRST REQUEST)

24 Plaintiff Freyssinet, Inc. and defendants Certain Underwriters at Lloyd's, London  
25 subscribing to policy no. B0595XN5229017 ("Underwriters") (erroneously sued as Certain  
26 Underwriters at Lloyd's London subscribing to Besso policy number B0595XN5229017, Apollo  
27 Liability Consortium Number 9984, including Apollo Syndicate Management Limited) hereby  
28 move pursuant to Federal Rule of Civil Procedure 6 and Local Rule IA 6-1 to extend Underwriters'

1 deadline to respond to Freyssinet's Complaint from April 5, 2021 to April 12, 2021. This is the first  
2 request to extend this deadline.

3 Freyssinet consented to an extension of Underwriters' time to respond to the Complaint for  
4 one week, until April 12, 2021, to give Underwriters additional time to instruct Nevada counsel and  
5 prepare to file a responsive pleading. Underwriters' request for an extension is made in good faith  
6 and is not intended to unreasonably delay this matter. The matter remains at the outset of litigation,  
7 as the parties have not yet held their case conference under Federal Rule of Civil Procedure 26(f)  
8 nor has a scheduling order been entered.

9 Based on the foregoing, the parties respectfully request that this Court extend Underwriters'  
10 deadline to respond to Freyssinet's Complaint from April 5, 2021 to April 12, 2021.

11 Dated this 2nd day of April 2021.

12 CLYDE & CO US LLP

SNELL & WILMER LLP

13 By: /s/ Jennifer McKee  
14 Jennifer McKee (9624)  
15 3960 Howard Hughes Parkway, Suite 500  
16 Las Vegas, Nevada 89169  
17 Telephone: (702) 633-5703  
18 Facsimile: (702) 990-3501  
19 Email: jennifer.mckee@clydeco.us  
20 Attorneys for Defendants Certain Underwriters at  
21 Lloyd's, London Subscribing to Policy No.  
22 B0595XN5229017 (erroneously sued as Certain  
23 Underwriters at Lloyd's London subscribing to  
24 Besso policy number B0595XN5229017, Apollo  
25 Liability Consortium Number 9984, including  
26 Apollo Syndicate Management Limited)

By: /s/ Kelly H. Dove  
Kelly H. Dove (10569)  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: kdove@swlaw.com  
Attorneys for Plaintiff Freyssinet, Inc.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: April 6, 2021